

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

STACY S.; and JOHN and MARY )  
ELLEN S., on behalf of their ) Civil Action No. 04-150E  
daughter, LEIGH ANN S., a minor )  
)  
Plaintiff, ) Jury Trial Demanded  
)  
v. )  
) ELECTRONICALLY FILED  
GIRARD SCHOOL DISTRICT; )  
ROBERT SNYDER, Individually )  
and in his capacity as )  
Principal of the Rice Avenue )  
Middle School; and GREGORY )  
YARBENET, a professional )  
employee of the Girard School )  
District, )  
)  
Defendants. )

**PLAINTIFFS' MOTION TO ENLARGE TIME TO FILE  
PRETRIAL STATEMENT AND DISPOSITIVE MOTIONS**

1. Plaintiffs have filed a motion to compel seeking discovery which is significant both for their decision of whether to file dispositive motions and their pretrial statement.

2. Plaintiffs request that the obligation to file a pretrial statement and/or dispositive motions be suspended until the discovery dispute is resolved and additional discovery obtained.

3. Plaintiffs' counsel is also involved in a trial before Judge Conti beginning October 17<sup>th</sup>. Plaintiffs have both damage expert and liability experts in this case. The reports will be submitted with the pretrial. Plaintiffs' counsel would be prejudiced in terms of dealing with those expert reports and preparing for the trial before Judge Conti.

4. Plaintiffs request at least an additional twenty-one (21) days to file dispositive motions and/or pretrial statement because of this.

WHEREFORE, Plaintiffs request they have until November 10, 2005, to file their dispositive motions and/or pretrial statement.

Respectfully submitted,

s/ Edward A. Olds  
Edward A. Olds, Esquire  
Pa. I.D. No. 23601  
Carolyn Spicer Russ, Esquire  
Pa. I.D. No. 36232  
Richard Matesic, Esquire  
Pa. I.D. No. 72211  
*Attorneys for Plaintiffs*

1007 Mt. Royal Boulevard  
Pittsburgh, PA 15223  
(412) 492-8975

**CERTIFICATE OF SERVICE**

I hereby certify that on October 6, 2005, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Richard A. Lanzillo, Esquire  
KNOX McLAUGHLIN GORNALL & SENNETT, P.C.  
120 West Tenth Street  
Erie, PA 16501

and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participant:

Edward J. Betza, Esquire  
150 East Eighth Street  
Erie, PA 16501

s/Edward A. Olds, Esquire

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